

Attachment 1 - Stormwater Management Program (SWMP) Update

BACKGROUND

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the Federal Clean Water Act, which is intended to protect and restore waters for “fishable and swimmable” uses. The Federal Environmental Protection Agency has delegated permit authority to state environmental agencies. In Washington, the NPDES-delegated permit authority is the Washington State Department of Ecology. Since Bonney Lake operates a small municipal storm sewer system that serves less than 100,000 people, it is designated as a Phase II community and must comply with Ecology’s Western Washington Phase II NPDES Municipal Stormwater Permit.

The Permit allows municipalities to discharge stormwater runoff from municipal drainage systems into the State’s water bodies (i.e. streams, rivers, lakes, wetlands, etc.) as long as municipalities implement programs to protect water quality to the “maximum extent practicable” through application of Best Management Practices. These required practices, specified in the Permit, are collectively referred to as the Stormwater Management Program (SWMP).

The Permit requires the City to report annually by March 31st of each year on program implementation for the prior year and requires municipalities to update the SWMP to describe the actions planned to achieve and maintain permit compliance in the upcoming year. The remainder of this document is intended to meet this requirement and describes the actions the City of Bonney Lake has planned to meet the permit requirements. The SWMP update is organized according to the following program components:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Operations and Maintenance
- Source Control Program for Existing Development
- Monitoring and Assessment

The goal of the SWMP is to apply all known and reasonable technologies (AKART) to reduce the discharge of pollutants into area receiving waters, protect surface waters from water quality degradation, and conserve aquatic ecosystems.

STORMWATER PLANNING

The City of Bonney Lake began preparing for the new Stormwater Planning Program Permit requirements by including the applicable milestones and deadlines in the Stormwater Comprehensive Plan update, completed by Parametrix Consultants in 2019. The City looks forward to expanding its stormwater planning efforts to better address high priority sub-basins in Bonney Lake and develop actionable steps for improving watershed health in the community.

S5.C.1.a: Convene an Inter-disciplinary Team for the Stormwater Planning Program

Development of an inter-disciplinary team was required as part of the Low Impact Development (LID) code review and revision process for the 2013-2019 Permit. This inter-disciplinary team also provided feedback during the Stormwater Comprehensive Plan kickoff meeting in 2018 and throughout comprehensive plan update meetings in 2019. In 2020, City staff will review the inter-disciplinary team membership and revise if necessary to best meet the needs for future Stormwater Planning Program efforts. The revised team will convene prior to the August 1, 2020 deadline to discuss stormwater planning Permit requirements and draft a plan of action.

S5.C.1.b: Coordinate with Long-Range Plan Updates to Address Water Quality

A summary of coordination with long-range planning efforts has not been prepared in the past by the City, due to the lack of this requirement in the 2013-2019 Permit. In 2020, City staff will begin an analysis of past efforts to address stormwater impact on water quality within long-range planning processes at the City, to be submitted by the March 31, 2021 deadline.

S5.C.1.c: Continue Requiring LID Principles and BMPs When Updating City Codes & Standards

Per the 2013-2019 Permit requirement, the following documents and code were reviewed for the initial LID code review:

- Bonney Lake Municipal Code
- Pierce County Stormwater & Site Development Manual
- City of Bonney Lake Development Policies & Public Works Design Standards
- LID Technical Guidance Manual for Puget Sound

The City's Public Services Division continues to review and revise Development Standards in accordance with LID principles.

S5.C.1.d.i: Document and Assess Receiving Waters and Create a Watershed Inventory

In 2019, Parametrix prepared a basin characterization report as part of the Stormwater Comprehensive Plan update. This report will be reviewed and revised as needed in 2020 and 2021 to meet the watershed inventory reporting requirement due in early 2022.

S5.C.1.d.ii: Develop and Implement a Receiving Water Prioritization Method and Process

In 2019, Parametrix also began preparing a Receiving Water Prioritization Method and Process as part of the Stormwater Comprehensive Plan update. Concurrent with the basin characterization report and

receiving water prioritization framework, the City will identify one high priority catchment area for which a Stormwater Management Action Plan (SMAP) will be developed in 2022, and submitted by the March 2023 deadline.

PUBLIC EDUCATION & OUTREACH

The City provides ongoing public education and outreach designed to reduce and eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. City staff utilize a variety of approaches to inform targeted audiences about stormwater issues and provides specific actions people can follow to minimize stormwater pollution.

S5.C.2.a.i-ii: Implement an Education and Outreach Program to Build General Awareness and Affect Behavior Change for the Area Served by the City's MS4

A summary of educational activities that occurred in 2019 and that are scheduled for 2020 is provided as follows:

- The City of Bonney Lake will continue the Stormwater Pollution Prevention Art Contest and Calendar Project. For the past ten years, the city has developed and distributed calendars to promote stormwater pollution prevention practices. To help convey these messages, the city holds an art contest open to our K-12 students. Winning entries from six categories including Pollution / Illegal Dumping Reporting, Friendly Vehicle Washing, Water Conservation, Pet Waste Disposal, Used Oil Recycling, and Household Hazardous Waste Disposal are used to develop the calendar.
- The city anticipates distributing stormwater pollution prevention informational flyers to City households regarding the general impacts of stormwater flows into surface waters and impacts from impervious surfaces including impacts from pet waste, vehicle fluids, household and lawn chemicals, car and impervious surface washing, and automotive and hazardous waste spills.
- At our annual Bonney Lake Days event; the city will continue displaying the stormwater pollution prevention booth and distributing informational flyers associated with proper hazardous waste disposal and information to implement used oil recycling, proper pet waste disposal, and environmentally friendly vehicle washing methods. The flyers also inform residents on natural yard care techniques and ways to conserve water and provides information on how and when to report an illicit discharge, pollution, and illegal dumping.
- The city plans to coordinate with volunteers and continue our storm drain marker program to label storm drains in residential neighborhoods. The curb markers help increase public awareness of the environmental effects of dumping in storm drains and remind the public of the direct connection between storm drains and our surface waters.
- Bonney Lake will continue to offer our “fish friendly” charity car wash kits which are designed to divert wash water to the sanitary sewer system and are loaned out by the City at no cost.
- Bonney Lake staff will continue to participate in regional forums that focus on stormwater education and permit requirements.
- The City of Bonney Lake will update our website stormwater page as needed.
- The City will continue to produce the monthly Bonney Lake Times newsletter which will cover a variety of topics on pollution prevention and general awareness of stormwater related issues. The newsletter is also used to inform the public about progress and implementation of the SWMP.

S5.C.2.a.iii: Provide and Advertise Stewardship Opportunities

The City plans to implement a new stream team program where trained volunteers can perform water quality monitoring on surface water bodies around the City. The resultant water quality information will be used to educate the community further on best management practices to maintain healthy surface water bodies in the City.

The City will also host volunteer events that encourage public participation in stewardship activities including storm drain marking, storm drain marker mapping, removing invasive plants, planting native vegetation and trees, and removing garbage and debris from local surface waters.

PUBLIC INVOLVEMENT & PARTICIPATION

The City encourages the public and interested parties to participate in the decision-making process involving the development of NPDES Permit related activities and programs.

S5.C.3.a: Create Opportunities for the Public to Participate in the Development, Implementation, and Update of the City's SMAP and SWMP

- Implementation of the City storm drain marker program utilizing Eagle Scout candidates and the public to install dump no waste curb markers adjacent to City storm drains.
- Install a staffed stormwater pollution prevention booth at Bonney Lake Days events and discuss the City stormwater pollution prevention public education materials with the community.
- Invite local K-12 students in the Bonney Lake community to participate in the annual stormwater pollution prevention art contest / calendar development program.
- The City's Stormwater webpage provides a general description of the Permit and displays the updated SWMP and the Annual Reports as they become available.
- Opportunities for public participation in the development of the SMAP will be considered and planned by the inter-disciplinary team in 2020.

S5.C.3.b: Post the SWMP Plan and Annual Report on the City's Website

The Stormwater page on the City website displays the updated SWMP and the Annual Report. Opportunity for public comment and participation is made possible via email year-round.

MS4 MAPPING & DOCUMENTATION

The City of Bonney Lake works to maintain the most up to date and accurate maps possible with regard to the MS4. These maps assist with operations and maintenance of the stormwater system, private and public stormwater system inspections, IDDE source tracing and identification, and mitigating potential downstream impacts of stormwater pollution.

S5.C.4.a: Maintain Ongoing Mapping Data

In 2019, the City performed routine updates to the MS4 mapping for new development and redevelopment and corresponding as-builts. These efforts will be continued in 2020. Additionally, the Stormwater Comprehensive Plan update will include basin boundaries and reviewed for possible adjustment and mapping updates.

S5.C.4.b: Update Outfall Mapping & Complete Mapping of All Known Connections from the MS4 to Privately Owned Stormwater Systems

Outfall inspections aimed at updating and improving map accuracy has been an ongoing effort. Inspection information is gathered and sent to the City GIS staff for inclusion in mapping updates. Any missing information on outfall size and material will be collected during the summer of 2020.

In 2020, the City will begin mapping all known connection points from the MS4 to privately owned stormwater systems in GIS. New, private stormwater infrastructure is updated in GIS on an ongoing basis, ensuring the most complete and up to date map at any given time. Mapping updates are requested when undocumented infrastructure is found through source control, IDDE, and private commercial site inspections. Additionally, any new development or construction that connects a private system to the public MS4 is mapped when the as-builts are submitted to GIS staff.

S5.C.4.c: Utilize Electronic Format for Mapping

The City has utilized GIS data and mapping since the early 2000's. The City continues to use ESRI ArcGIS and AutoDesk AutoCAD for electronic mapping.

S5.C.4.d-e: Provide Mapping Information, Upon Request, to Ecology, Indian Tribes, Municipalities, and Other Permittees

Mapping requests from the public, Ecology, Indian Tribes, Municipalities, and Other Permittees are met on an ongoing basis.

ILLICIT DISCHARGE DETECTION & ELIMINATION

The City of Bonney Lake maintains an ongoing Illicit Discharge Detection and Elimination program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the municipal stormwater system.

S5.C.5.a: Include procedures for Identifying, Reporting, Correcting, and Removing Illicit Discharges and Illicit Connections in the IDDE program

City staff continue to update the City's IDDE Field Procedures and Response Plan that outlines procedures for identifying, reporting, correcting, and removing illicit discharges and illicit connections. The plan is updated to include more consistent and timely enforcement measures to facilitate compliance and correct illicit discharges and corrections.

S5.C.5.b: Inform Public Employees, Businesses, and the General Public about the Hazards Associated with Illicit Discharges and Improper Disposal of Waste

City staff works to expand education and outreach efforts on various hazards associated with illicit discharges and improper disposal of waste. In 2020, staff will continue to review and revise these efforts, which include:

- Utilizing the updated IDDE Field Procedures and Response Plan for all applicable public employees to introduce them to the program and orient them with City procedures for investigating, identifying, enforcing, and eliminating illicit discharges and illicit connections;
- Increasing the volume of technical assistance letters that are issued as a result of IDDE and source control investigations where the potential for prohibited discharges exist. These letters contain information about City code regarding prohibited discharges, City enforcement policies and procedures if prohibited discharges do occur, and information regarding operational and structural BMPs that can assist with prohibited discharge prevention;
- Placing educational stickers on dumpsters during routine source control site inspections that remind businesses and multi-family housing establishments to close their dumpster lids to avoid leachate and other prohibited discharges;
- Emphasizing the harmful effects of stormwater pollution when presenting to the general public at Bonney Lake Days booths and other local tabling events, and providing educational materials to citizens about residential BMPs, such as vehicle washing and proper pet waste disposal, and notifying them about City and County programs, such as the City's car wash kits and Pierce County's hazardous waste disposal resources;
- Educating participants in the City's Stream Team Program about the hazards of illicit discharges during classroom training in the program;

Furthermore, in 2020 an internal Public Works team will be working to engage the general public in understanding what work the Public Works division does in the community and also create more visible and accessible modes for citizens to report issues found within the City, including illicit discharges.

S5.C.5.c: *Implement an Ordinance or Other Enforceable Mechanism to Prohibit Illicit discharges into the City's MS4*

City ordinance 1330 prohibits non-stormwater discharges into the City's MS4 and Bonney Lake Municipal Code Chapter 15.13 lists prohibited, allowable, and conditional discharges into Bonney Lake waters and storm drainage systems. Examples of illicit discharges include trash, food wastes, construction materials, petroleum products, sewage, paint, pesticides, fertilizers, soap, and sediment. The City implements escalating enforcement procedures and actions pursuant to those outlined in the code. In 2020, the City will continue implementing enforcement procedures to achieve more efficient compliance.

S5.C.5.d-e: *Implement an Ongoing Program to Detect, Identify, and Address Illicit Discharges, Including Spills and Illicit Connections, into the City's MS4*

In 2019, the City met the Permit requirement for screening 40 percent of the City's stormwater system for illicit connections through video inspections, visual inspections of the open stormwater conveyance system and inlet structures, and visual inspection of stormwater ponds. This program is ongoing and in 2020 City staff will:

Continue to inspect private commercial stormwater systems that discharge into the City's MS4 to ensure maintenance complies with standards outlined in the Permit. City staff incorporates an education and outreach program into the commercial site inspection program. This component provides information on stormwater systems to property owners and their representatives. In addition, the outreach program provides information on BMPs targeted to each site's commercial activities and land use. This year, staff will work to incorporate more feedback mechanisms from property owners and managers to ensure outreach methods and materials are accessible and effective, and will use the collected data to update outreach efforts for commercial sites.

Continue to collect and analyze data on commercial site inspection results, enforcement actions, water quality violations, and compliance timelines to better perform commercial site and source control inspections.

In 2019, City staff continued to use the Eden data management and Cityworks programs to report illicit discharges and connections, track staff response logs, and document enforcement actions. Analysis of this information coupled with evaluation of enforcement actions and compliance timelines will allow City staff to better target outreach and technical assistance efforts to reduce common illicit discharges.

S5.C.5.f: *Provide IDDE Staff Training*

The City will continue providing training to all City of Bonney Lake field staff in the identification of illicit discharges and notification to appropriate authorities. Additionally, all maintenance personnel and inspectors are trained in spill response and first responder hazard awareness. City staff will continue to review field procedures for identifying, tracing, reporting, and documenting all reported illicit discharges.

S5.C.5.g: *Track and Maintain Records of IDDE Program Activities*

In 2019, City staff continued utilizing management software systems to track and record all reported water quality violations and associated documents, including: photographs, site maps, correspondence, and final resolution. Commercial site inspections and source control inspections are tracked through spreadsheets and active construction sites are tracked through the City's permitting system, Eden. In 2020, City staff will utilize Cityworks for recordkeeping activities associated with IDDE investigations, private commercial site inspections, and source control inspections.

CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, & CONSTRUCTION SITES

Construction site runoff is a major contributor to water quality degradation in the greater Puget Sound region. To address this issue, the City adopted the current Pierce County Stormwater and Site Development Manual. Changes were also made to the Bonney Lake Development Policies and Public Works Design Standards to make Low Impact Development (LID) the required approach in site development.

S5.C.6.a-b: Implement an Ordinance or Other Enforceable Mechanism to Address Runoff from New Development, Redevelopment, and Construction Sites

City of Bonney Lake Development Policies and Public Works Design Standards and the Pierce County Stormwater and Site Development Manual include minimum requirements for stormwater design and construction for the protection of water quality and the reduction of pollutant discharge.

S5.C.6.c: Apply a Permitting Process with Site Plan Review, Inspection, and Enforcement Capability for New Development, Redevelopment, and Construction Sites

In 2020, the Public Services Department will continue to implement the City's permitting process, including civil/site plan review and approval for compliance with City of Bonney Lake standards. Public projects in the right-of-way that trigger local permits will be reviewed by internal stormwater staff. During construction, Public Works staff will continue to conduct site inspections to ensure implementation of proper temporary erosion and sediment control (TESC) BMPs. City inspectors have the authority to enforce TESC standards for both private and public projects in order to reduce pollutants in stormwater runoff to the MS4 and surface waters from new development, redevelopment, and construction site activities.

Public Services Department staff updated the City's development standards which includes a review of planned LID criteria. This review is part of the City's effort to require LID principles and LID BMPs to make it the preferred and commonly used approach to site development. City staff will continue the ongoing revision process of the Development Standards to improve clarity and review potential updates to LID criteria.

The City has an ongoing program to verify that long term operation and maintenance (O&M) of post construction stormwater facilities and BMPs is implemented. The City requirements for maintenance standards are identified under the current Pierce County Stormwater and Site Development Manual Appendix I-A, Maintenance Checklists. In 2020, Public Works staff will continue post construction inspections prior to release of warranty bonds, and will review post construction inspection procedures in conjunction with the Development Standards update. Furthermore, Public Works staff will work on implementing increased site assessment procedures that align with the updated Department of Ecology Standards for new development, redevelopment, and construction activities on plats, single family projects, and commercial sites.

S5.C.6.d: Provide Notice of Intent (NOI) for Proposed New Development and Redevelopment

The City's program to control runoff from new development, redevelopment, and construction sites has made available the link to the electronic Construction Stormwater General Permit Notice of Intent (NOI)

form for construction activity and a link to the electronic Industrial Stormwater General Permit NOI form for industrial activity to representatives of proposed new development and redevelopment.

S5.C.6.e: *Ensure Staff Training for Implementation of Runoff Control Program*

Plan reviewers are managed by a professional licensed engineer and all City staff responsible for approval and/or inspection of new development, redevelopment, and construction are certified erosion and sediment control leads (CESCL). All City inspectors are also trained with material from the American Public Works Association and EXCAL Visual. In 2020, APWA and EXCAL Visual training will continue for new employees and to our existing team as an ongoing training program. Furthermore, management will also continue researching training opportunities for inspectors and field staff responsible for implementing the runoff control program.

OPERATION & MAINTENANCE

The City of Bonney Lake has an ongoing program to reduce stormwater impacts associated with maintenance and operations of City streets, facilities, and properties. The program applies to drainage infrastructure including catch basins, pipe, open channels, and retention/detention facilities.

S5.C.7.a: Implement Maintenance Standards

In 2020, City of Bonney Lake staff will continue to implement maintenance standards as outlined in the adopted and current Pierce County Stormwater and Site Development manual. All inspection criteria utilized in stormwater system inspections are followed directly from this source.

S5.C.7.b: Maintain Stormwater Facilities Regulated by the Permittee

In 2020, City staff will continue inspecting stormwater treatment and flow control facilities regulated by the City, as required by the Permit. Facilities permitted by the City that discharge to the City's MS4 will be inspected to verify maintenance requirements.

S5.C.7.c: Maintain Stormwater Facilities Owned or Operated by the Permittee

- In 2020, City staff will continue inspecting known municipally owned and operated stormwater treatment and flow control facilities as required by the Permit. Control structures, retention/detention ponds, and bioswales are inspected and maintained annually. Maintenance records are documented for all stormwater infrastructure maintained in the MS4.
- City staff will continue to inspect facilities vulnerable to surface water related problems before, during, and after major storm events to ensure the systems are functioning properly, and to determine/conduct any maintenance or repair needs.
- The City of Bonney Lake will continue to inspect and clean when necessary catch basins owned by the City. In 2020, the City will incorporate an annual assessment into the City's catch basin inspection program. Annual assessments will include a review of the City's circuit schedules, inspection results, and cleaning and maintenance records. Staff will use this assessment to adjust the City's circuits in order to comply with the requirements of an alternate inspection schedule under the current Permit cycle (2019-2024).
- The City will continue implementing an inspection program using mobile technology that provides accurate measuring and tracking of catch basin sediment levels. In 2020, field staff will continue working with GIS staff to record, update, and report catch basin inspection data.

S5.C.7.d: Implement Practices, Policies, and Procedures to Reduce Stormwater Impacts Associated with Runoff from All City Owned or Maintained Lands, and City-Controlled Road Maintenance Activities

City staff implemented new procedures and practices for managing the stormwater infrastructure maintenance program. Included in the updated program were changes in tracking and recording of maintenance activities. In 2020, staff will continue updating the City's maintenance Standard Operating Procedures (SOPs) to form the City's Maintenance Manual.

In 2020, staff will review Streets and Parks O&M SOPs for adherence to permit requirements for reduction of stormwater impacts associated with maintenance activities.

S5.C.7.e: *Ensure Staff Training for Operations and Maintenance Personnel*

City field staff are trained in IDDE and spill response procedures. In 2020, field staff responsible for construction operations, street maintenance, parks, and facilities maintenance will also receive training in construction BMPs and review of Stormwater Pollution Prevention Plan (SWPPP) and TESC requirements.

Licensed maintenance personnel are trained on an annual basis for pesticide / herbicide application and this program will continue in 2020.

S5.C.7.f: *Implement a Stormwater Pollution Prevention Plan for All Heavy Equipment, Maintenance, or Storage Yards, and Material Storage Facilities Owned or Operated by the Permittee*

In 2020, staff will review and update the Stormwater Pollution Prevention Plan for the existing Public Works Center and storage yard facilities. This plan includes a drainage map of the yard and material storage locations, and spreadsheets that document staff responsibilities, inspection results, spill events, staff training, and associated BMPs. Staff will also develop a SWPPP for the new Public Works Center and corresponding heavy equipment, storage yard, and material storage upon completion.

In 2020, staff will work with the Parks Division to identify additional City-owned storage yards or facilities that may require SWPPPs and corresponding SWPPPs will developed as applicable.

In 2020, staff will continue reviewing policies and procedures to ensure proper pollution management practices are consistently being implemented and documented, and will update the training materials provided to staff for the annual SWPPP training.

S5.C.7.g: *Maintain Records of Operations and Maintenance Program Activities*

In 2019, a review of records retention and data collection was continued as part of the updated procedures and practices for operation, maintenance, and repair. In 2020, staff will be refining the implementation plan for digitizing all O&M and repair records as well as standardizing maintenance records procedures.

SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

In recent years, staff has identified a growing need to include more preventative measures within the stormwater management program. One of the primary actions identified was to reinstate a source control inspection program within the Stormwater Division. This program will allow staff to better engage business owners in conversations about stormwater pollution, provide business-specific BMPs to prevent illicit discharges, and enforce illicit discharges if found during inspections.

S5.C.8.a: Implement a Program to Prevent and Reduce Pollutants in Stormwater Runoff

Staff identified a need to include more preventative actions within the stormwater management program. One of the primary ways identified was to resume a source control inspection program within the Stormwater Division. Staff completed an inventory and captured businesses that have a high potential for generating stormwater pollution. In 2020, staff will continue to assess and update the program to more effectively educate business owners and managers on the causes and harmful effects of stormwater pollution, what constitutes a water quality violation and how the City enforces such violations, and operational and structural BMPs tailored to their business activities that can assist with stormwater pollution prevention.

S5.C.8.b.i: Adopt an Ordinance or Other Enforceable Documents Requiring Source Control BMPs

In 2020, staff will begin the initial planning and code review process to determine the most effective method for adopting an Ordinance or other enforceable documents requiring source control BMPs for existing sites, and will create a timeline to ensure adoption of this language prior to the August 2022 deadline.

S5.C.8.b.ii: Establish an Inventory of Public and Private Sites with Potential to Pollute MS4

Staff created an inventory of businesses with potential pollution-generating activities. The inventory includes information on the business name, business location, potential pollution sources, inspection history, and enforcement measures taken, if any. This inventory was updated to include automotive-related businesses, gas stations, and restaurants. Staff will continue to evaluate and revise the inventory as necessary to account for changes in land use and development.

S5.C.8.b.iii: Implement an Inspection Program for Pollutant-Generating Sites

Staff will begin conducting regular source control site inspections throughout the City, using the inventory for scheduling and as a recordkeeping document for inspections by the permit deadline.

S5.C.8.b.iv: Implement a Progressive Enforcement Policy for Stormwater Compliance

Following a source control inspection in which a potential water quality violation is observed, staff will issue a technical assistance letter to the business informing them about the potential violation, harmful effects of stormwater pollution, and BMPs they can implement to prevent illicit discharges from occurring. When an illicit discharge is found during a source control inspection, staff will issue a formal Notice of Water Quality Violation that contains similar information to the technical assistance letter, but also outlines required corrective actions to eliminate the discharge and a deadline by which to complete

these actions. All of these enforcement actions are recorded in the source control inspection inventory, and if at the level of a water quality violation, are recorded in the City's asset data management system.

S5.C.8.b.v: *Ensure Staff Training for Source Control Program*

Staff that perform source control inspections will be trained in the source control inspection program with an emphasis on inspection procedures, recordkeeping, and commercial-related BMP resources. Staff members involved with the source control program are also required to attend the Illicit Discharge Detection and Elimination training to ensure proper identification and notification of illicit discharges if found during source control inspections.

MONITORING

A collaborative monitoring program is paid for by Western Washington NPDES Permittees, administered by Ecology, and designed to monitor and evaluate the effectiveness of the best management practices specified in the Permit. The goal of the monitoring program is to provide an unbiased assessment of whether stormwater management actions are resulting in genuine progress towards regional water quality targets. In 2020, the City will continue to pay into the collective fund and support the implementation of the three components of the Regional Stormwater Monitoring Program:

- Status and trend monitoring studies to measure whether the health of lowland streams and shorelines in Puget Sound is improving or declining;
- Stormwater effectiveness studies to provide widely applicable information about what best management practices work, or don't work, and how to improve stormwater management; and
- Source Identification Information Repository designed to share information about source identification and elimination methods and identify opportunities for regional solutions to common illicit discharges and pollution problems.

CONCLUSION

The annual report and SWMP update is posted on the City of Bonney Lake website at https://www.ci.bonney-lake.wa.us/government/departments/public_services/public_works/stormwater

If at any time the City is unable to comply with the terms and conditions of the permit, staff must notify the Washington State Department of Ecology within 30 days of becoming aware that non-compliance has occurred. Written notification must include a description of the non-compliance issue and steps planned or taken to achieve compliance. The City remains in compliance with the Permit and is using all known, available, and reasonable methods of prevention, control, and treatment to prevent pollution into the surface waters of Washington State.